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7 UNITED STATES DISTRICT COURT  
8 FOR THE CENTRAL DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA, ) SA CR \_\_\_\_\_  
10 )  
11 Plaintiff, ) INFORMATION  
12 )  
13 v. ) [18 U.S.C. §§ 1343, 1346:  
14 ) Honest Services Wire Fraud]  
15 KEITH TAYLOR, )  
16 )  
17 Defendant. )  
18 \_\_\_\_\_ )

19 The United States Attorney charges:

20 [18 U.S.C. §§ 1343, 1346]

21 INTRODUCTION

22 1. At all times relevant to this information:

23 a. Zurich Payroll Services, Inc. and its  
24 subsidiaries, Zurich Payroll Operations Limited and Daton Pay,  
25 USA, Inc. (Collectively "Zurich") were corporations in the  
26 business of providing payroll and tax withholding services to  
27 clients.

28 b. Defendant KEITH TAYLOR ("TAYLOR") was Zurich's  
controller and possessed signatory authority over Zurich's Tax

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DAH:dah

1 Trust Accounts. As the controller, TAYLOR was placed in a  
2 position of trust and owed a duty of honest services to Zurich.  
3 This duty of honest services included an obligation to conduct  
4 his duties in an honest, faithful and disinterested manner, free  
5 from self dealing.

6 SCHEME TO DEFRAUD

7 2. Beginning in 1999 and continuing to a date unknown,  
8 TAYLOR devised, intended to devise and knowingly participated in  
9 a scheme and artifice to defraud Zurich of its right to TAYLOR'S  
10 honest services.

11 3. TAYLOR defrauded Zurich by the following means and  
12 methods, among others:

13 a. Over an approximate three year period, TAYLOR  
14 drafted checks to himself on Zurich's tax trust accounts in  
15 amounts between \$1,852 and \$49,000 and totaling in excess of  
16 \$10,000,000.

17 b. Taylor signed these checks, endorsed these checks  
18 and deposited them into his personal accounts.

19 c. Taylor wired funds from his personal accounts to  
20 investment and other accounts.

21 WIRING

22 4. On or about November 1, 2000, TAYLOR, for the purpose  
23 of executing the scheme and artifice to defraud, knowingly and  
24 willfully caused to be transmitted by wire communications a  
25 \$220,000 wire transfer from Wells Fargo Bank in Orange County,

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1 California to First Union National Bank in Pembroke Pines,  
2 Florida.

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4 DEBRA W. YANG  
United States Attorney

5 JACQUELINE CHOOLJIAN  
6 Assistant United States Attorney  
Chief, Criminal Division

7  
8 JOHN C. HUESTON  
9 Assistant United States Attorney  
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